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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,)	Case No. 2:12-cr-00237-APG-CWH
)	
Plaintiff,)	<u>Stipulation to Continue Revocation</u>
)	<u>Hearing</u>
vs.)	
)	
PERLA RAMIREZ,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between DANIEL G. BOGDEN, United States Attorney, and CRISTINA D. SILVA, Assistant United States Attorney, counsel for the United States of America, and MICHAEL KIMBRELL, Esq., counsel for defendant PERLA RAMIREZ, that the hearing on the defendant's supervised release violation in the above-captioned matter, currently scheduled for August 5, 2015, at 10:30 am, be vacated and continued for ten (10) days, to a date and time to be set by this Honorable Court.

This stipulation is entered into for the following reasons:

1. The Government intends on filing a motion that will impact Ms. Ramirez's status as a material witness. Additional time is needed for the Government to file that motion and for the Court to consider the motion. The motion may impact the defendant's resolution of her alleged supervised release violations.

2. The parties and the United States Probation Office anticipate agreeing to a recommendation for a revocation of the defendant's supervised release.

3. The parties agree to the brief continuance.

4. The defendant is incarcerated and does not object to the continuance.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. The additional time requested herein is not sought for purposes of delay, but allow for a possible resolution to the defendant's material witness hold, which may impact the resolution of the instant matter.

DATED this 4th day of August, 2015.

Respectfully submitted,
DANIEL G. BOGDEN
United States Attorney

//s//
MICHAEL KIMBRELL, ESQ.
Counsel for Defendant
PERLA RAMIREZ

//s//
CRISTINA D. SILVA
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,) Case No. 2:12-cr-00237-APG-CWH
)
Plaintiff,) **ORDER**
)
vs.)
)
PERLA RAMIREZ,)
)
Defendant.)

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Government intends on filing a motion that will impact Ms. Ramirez's status as a material witness. Additional time is needed for the Government to file that motion and for the Court to consider the motion. The motion may impact the defendant's resolution of her alleged supervised release violations.

2. The parties and the United States Probation Office anticipate agreeing to a recommendation for a revocation of the defendant's supervised release.

3. The parties agree to the brief continuance.

4. The defendant is incarcerated and does not object to the continuance.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. The additional time requested herein is not sought for purposes of delay, but allow for a possible resolution to the defendant's material witness hold, which may impact the resolution of the instant matter.

7. This is the first request to continue the hearing regarding revocation of supervised release date filed herein.

1 For all of the above-stated reasons, the ends of justice would best be served by a
2 continuance of the revocation hearing.

3 **CONCLUSIONS OF LAW**

4 The ends of justice served by granting said continuance outweigh the best
5 interest of the public and the defendant, since the failure to grant said continuance would be
6 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the
7 opportunity within which to be able to effectively and thoroughly prepare for the hearing, as
8 well as possibly resolve the alleged violations of supervised release, taking into account the
exercise of due diligence.

9 **ORDER**

10 IT IS THEREFORE ORDERED that the revocation hearing currently
11 scheduled for August 5, 2015, at the hour of 10:30 am, be vacated and continued to
12 August 19, 2015 at the hour of 10:30 am.

13 DATED 5th day of August, 2015.

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16 HONORABLE ANDREW P. GORDON
17 UNITED STATES DISTRICT COURT JUDGE
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